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4 SELECT COMMITTEE TO INVESTIGATE THE  
5 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,  
6 U.S. HOUSE OF REPRESENTATIVES,  
7 WASHINGTON, D.C.

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11 DEPOSITION OF: MICHAEL ROMAN

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14

15 Wednesday, August 10, 2022

16

17 Washington, D.C.

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20 The deposition in the above matter was held via Webex,  
21 commencing at 10:02 a.m.

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2     Appearances:

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5     For the SELECT COMMITTEE TO INVESTIGATE  
6     THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

7

8     [REDACTED] STAFF ASSOCIATE

9     [REDACTED], PROFESSIONAL STAFF MEMBER

10    [REDACTED] SENIOR INVESTIGATIVE COUNSEL

11    [REDACTED], CHIEF INVESTIGATIVE COUNSEL

12    [REDACTED] INVESTIGATIVE COUNSEL

13    [REDACTED], CHIEF CLERK

14

15

16     For the WITNESS:

17

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1

2 [REDACTED] It is August 10th, and this is a deposition  
3 of Mr. Michael Roman conducted by the House Select Committee to  
4 Investigate the January 6th Attack on the United States Capitol  
5 pursuant to House Resolution 503.

6 At this time, I'd ask you, Mr. Roman, to state your full  
7 name and spell your last name for the record.

8 Mr. Roman. Michael A. Roman. Romeo, Oscar, Mike,  
9 Echo (sic), November.

10 [REDACTED] Thank you, Mr. Roman.

11 And I see that we have a few people from Mr. Warrington's  
12 law firm joining as counsel today.

13 Mr. Warrington, if you could introduce yourself and then,  
14 I think, for efficiency, if you could just introduce the others  
15 and identify their positions.

16 Mr. Warrington. Sure. Absolutely.

17 David A. Warrington, W-a-r-r-i-n-g-t-o-n, for Mr. Roman.

18 Along with me from our firm are Mike Columbo, C-o-l-u-m-b-o;  
19 Jonathan Shaw, S-h-a-w; and Glynis Gilio, G-i-l-i-o.

20 [REDACTED] Very good. Thank you. And they're all  
21 attorneys on the team representing Mr. Roman, correct?

22 Mr. Warrington. That's correct.

23 [REDACTED] Very good.

24 All right. At this time, I'd ask the reporters who are  
25 joining remotely to swear in Mr. Roman.

1           The Reporter. Do you solemnly declare and affirm that the  
2 testimony you are about to give will be the truth, the whole  
3 truth, and nothing but the truth?

4           Mr. Roman. I do.

5           ██████████ Thank you very much.

6           So this is going to be a staff-led deposition, but if any  
7 members of the select committee join, they of course may choose  
8 to also ask questions.

9           You can see there on the platform, if you have the  
10 participants list up, everybody who's in the meeting remotely.  
11 And if any members join, I'll try to announce their presence so  
12 that you, Mr. Warrington, and the others know that they're here,  
13 and I'll try to do so as quickly as possible, though there may  
14 be a delay.

15          Just introducing the people that are in the room with me,  
16 my name is ██████████ I'm a senior investigative counsel for  
17 the select committee. To my left is ██████████, investigative  
18 counsel for the committee, and to my right is professional staff  
19 member ██████████, who's also with the select committee. On  
20 the platform, other staff is joining as well, including our chief  
21 clerk, ██████████, and potentially others as well.

22          You also see a number of official reporters. They are  
23 taking the official record of today's deposition. There are  
24 more than one, and there are likely going to be more than one,  
25 but there's only one of them who's taking the official record

1 at a time.

2 Just to go over some of the ground rules that we're going  
3 to be following, under the House deposition rules, neither the  
4 committee members nor staff may discuss the substance of  
5 testimony you provide today unless the committee approves it  
6 release. And you and Mr. Warrington, your attorneys, will have  
7 an opportunity to review the transcript after we're done here  
8 today.

9 We're going to follow the House deposition rules that we  
10 provided to Mr. Warrington previously. Under those rules,  
11 counsel for other persons or government agencies may not attend.  
12 And, of course, you are allowed to have an attorney present, and  
13 we've noted their presence already on the record today.

14 It is against the rules to make any outside recordings of  
15 this, and I'd just ask for you to confirm that neither you nor  
16 anyone you're aware of is recording this session on your end.  
17 Is that correct?

18 Mr. Warrington. We're not recording.

19 [REDACTED] Okay. Thank you, Mr. Warrington.

20 Like I mentioned before, there's an official reporter  
21 transcribing the record of this deposition. Because it's done  
22 using stenography, please wait until my question is complete  
23 before you begin your response, and I will let you complete your  
24 response before asking my next question.

25 Of course, the reporter can't take nonverbal responses,

1     like shaking your head, so it is important that you answer each  
2     question with an audible and verbal response.

3             We do ask that you provide complete answers based on your  
4     best recollection. We understand that some of these events  
5     happened over a year ago, and so if you don't remember something,  
6     that's perfectly fine; you can just say so. But you are under  
7     oath, and if do you remember something, you are obligated to  
8     provide that information.

9             Also, if a question that I ask is not clear, please go ahead  
10    and ask for clarification. Or if anybody else asks a question  
11    that's unclear, same thing. We'd rather have you answer a  
12    question that you understand than try to answer one that you  
13    don't.

14            You may only refuse to answer a question to preserve a  
15    privilege recognized by the select committee. And if you refuse  
16    to answer a question based on a privilege, we can either proceed  
17    with the deposition or seek a ruling from the chairman on the  
18    objection. If the chairman overrules such an objection, you  
19    would be required to answer the question.

20            And, finally, I do want to let you know that it's unlawful  
21    to deliberately provide false information to Congress. And  
22    since this deposition is under oath, providing false information  
23    could result in criminal penalties for perjury and/or providing  
24    false statements.

25            Logistically, the last thing I'll mention here is that

1 please just let us know if at any time you need a break, either  
2 for comfort or to speak with Mr. Warrington or any of your  
3 attorneys. We're happy to allow for that, to comply with that.  
4 And if you do so, I would just recommend that you turn off your  
5 microphone and turn off your video so that nobody is going to  
6 hear your end of the conversation that you're having.

7 Are there any questions about anything that we just went  
8 over?

9 Mr. Roman. No.

10 [REDACTED] Okay. Did you understand everything?

11 Mr. Roman. Yes.

12 [REDACTED] Very good.

13 At this point, Mr. Warrington, I don't know if you have  
14 anything that you would like to put on the record before we begin  
15 questions, but if you'd like to, now's the opportunity.

16 Mr. Warrington. No, I don't.

17 [REDACTED] Okay. Very good.

18 EXAMINATION

19

BY [REDACTED]

20 Q Then, at this time, I'm going to pull up exhibit No. 1.  
21 Make sure you can see that. And this is a subpoena titled at  
22 the top exhibit No. 1.

23 If we could blow that up a little bit.

24 Bear with us one moment.

25 There we go. Are you able to see the exhibit we've just

1 put up, Mr. Roman?

2 A Yes.

3 Q Very good. Thank you. And do you understand you're  
4 appearing pursuant to the subpoena dated March 28, 2021, with  
5 your name, Michael A. Roman, at the top of it?

6 A There's a different date on the subpoena you have on the  
7 screen.

8 Q I'm sorry. If we go down, we'll show you the date that  
9 the subpoena was actually issued. At the bottom of page 1 there,  
10 it's March 28th.

11 A Okay.

12 Q Do you understand you're appearing here today pursuant  
13 to this subpoena?

14 A Yeah, I believe so. There were two subpoenas.

15 Q Okay. This one, though, is the second one that you  
16 actually were served with, correct?

17 A Yes.

18 Q Very --

19 A I believe so.

20 Q -- good.

21 And the subpoena that you received did require the  
22 production of documents described in the schedule attached to  
23 the subpoena. Are you aware of that?

24 A Yes.

25 Q We received from you through Mr. Warrington



1 approximately 74 files, give or take. But after that  
2 production, we understand that other responsive documents would  
3 not be produced based on an assertion of the Fifth Amendment  
4 privilege.

5 Is that your understanding of the document production?

6 A My attorney has my documents.

7 Q Okay. And is that your understanding of the  
8 production, that some were produced and others may or may not  
9 have been if they were responsive documents?

10 A Yes.

11 Q Have you destroyed, deleted, or otherwise manipulated  
12 any documents that are responsive to the request described in  
13 the subpoena, regardless of whether they were produced or not?

14 A No.

15 Q Other than your lawyers, have you coordinated with  
16 anyone about your production of documents to the select  
17 committee?

18 And just to be clear, I don't want to get into any  
19 discussions that you've had with your lawyers that would be  
20 privileged.

21 Mr. Roman. Can we mute it for a second?

22 [REDACTED] Sure.

23 [Witness conferring with counsel.]

24 Mr. Warrington. And just to be clear, [REDACTED], we had a  
25 third-party vendor involved in the collection of documents.

1 That's the only other person -- or, only other people that  
2 were -- and they were working for us, the law firm.

3 M [REDACTED] Okay.

4 BY [REDACTED]

5 Q So then, [REDACTED] I guess I'll just clarify by saying  
6 that. Other than your lawyers and anybody hired by your lawyers  
7 to help with the production of documents, have you coordinated  
8 with anybody about which documents to produce or not to produce  
9 to the select committee?

10 A No.

11 Q And other than your lawyers or anybody hired by your  
12 lawyers for your appearance before the select committee, have  
13 you coordinated with anybody about the testimony that you may  
14 provide here today?

15 A No.

16 Q So my goal today is to ask questions that are relevant  
17 to our investigation, with the hope that you're going to answer.  
18 If you do have an objection or privilege assertion, we'll ask  
19 that you assert it for the record.

20 And I note that there has been some correspondence on this  
21 issue with Mr. Warrington as well as the chairman of the select  
22 committee.

23 So I do want to start, though, with your professional  
24 background. I understand that back in the '90s you began, I  
25 guess, a career in politics. You worked with State Senator -- or

1 the campaign for State Senator Bruce Marks in Pennsylvania, is  
2 that right, around 1993?

3 A Yes.

4 Q And you yourself were elected a ward leader in  
5 Philadelphia in 2002 or thereabouts?

6 A Yes.

7 Q Did you serve as that for about 4 years, until 2006?

8 A Yes.

9 Q And I understand you also worked with the Pennsylvania  
10 House Republican Campaign Committee. Is that correct?

11 A Yes.

12 Q Approximately how long did you do that, if you can  
13 recall?

14 A I don't recall.

15 Q Ultimately you worked through various other jobs,  
16 ending up in Mr. Trump -- Trump's White House starting in 2017.  
17 Was that the beginning of the Trump administration?

18 A Yes.

19 Q What was your role in the White House?

20 A Special Assistant to the President.

21 Q Did you have a particular portfolio that you worked?  
22 [Witness conferring with counsel.]

23 Mr. Roman. Yes. I was working in White House Counsel's  
24 Office, assisting with vetting and clearance counsel.

25

BY

1           Q    I've seen that you may have also had as part of your title  
2   or a description of your job "Director of Special Projects and  
3   Research." Is that right?

4           A    Yes.

5           Q    Was that the same job duties that you just described  
6   working on inside White House Counsel's Office?

7           A    Yes.

8           Q    And you said "clearance counsel." Is that nominations?  
9   Or could you be a little bit more specific about what that  
10   involved?

11          A    Yes. Nominations.

12          Q    Did you have any other roles outside of the nominations?

13          A    Vetting of potential employees.

14          Q    Okay. Employees --

15          A    Non-Senate-confirmed employees.

16          Q    Did you do that with the Personnel Office?

17          A    No. That was through White House Counsel's Office and  
18   PPO.

19          Q    And when you say "employees," are you talking about  
20   White House employees or administration employees more broadly?

21          A    Administration employees.

22          Q    So it could be at other agencies in the executive branch.

23          I understand you left the White House around 2018. Is that  
24   right?

25          A    Yes.

1 Q Where did you go after leaving the White House?

2 A Philadelphia.

3 Q Okay. And where were you working?

4 A I was consulting.

5 Q With whom? As an employer, as opposed to your clients.

6 A I --

7 Q Who was your employer?

8 A I was self-employed.

9 Q Eventually you made it to the Trump reelection campaign.  
10 When did you start working with the Trump reelection campaign?

11 A I don't recall the exact month that I went with the Trump  
12 reelect.

13 Q Do you remember what year it was?

14 A 2019.

15 Q Could you give us a season? Summer? Fall? Winter?  
16 Spring? If you recall.

17 A It was before the -- it was before summer. So it  
18 would've been in the first half of the year.

19 Q Were you asked to join the campaign by the President or  
20 anybody else?

21 A I don't recall who -- the President didn't ask me to join  
22 the campaign.

23 Q When you joined the campaign around springtime of 2019,  
24 what were your responsibilities?

25 A I was working on -- I was doing some -- I had a number

1 of things I was doing. I'm -- I can't recall all of my projects  
2 that I had.

3 Q Okay. Can you give us a flavor, just some of them, the  
4 type of work that you were doing?

5 A Normal campaign outreach.

6 Q Like knocking on doors?

7 A No. I was not knocking on doors.

8 Q Okay. So what does "outreach" mean to you when you say  
9 that?

10 A Coordinating with people in the States.

11 Q State officials?

12 A No. Campaign.

13 Q Okay. And you were working out of Pennsylvania?

14 A Yes.

15 Q But your job involved coordinating with people in other  
16 States outside of Pennsylvania? Is that fair?

17 A Yes.

18 Q Did you have interactions with any State officials in  
19 Pennsylvania or otherwise during your work on the Trump  
20 reelection campaign?

21 A Yes.

22 Q Okay. With whom? Which States did have you contact  
23 with State officials?

24 A I don't recall the States. Um -- I don't recall the  
25 States.

1 Q Pennsylvania?

2 A Pennsylvania, yes.

3 Q And did you have a primary contact, as far as State  
4 officials in Pennsylvania, that you would usually speak to about  
5 campaign-related issues?

6 A No.

7 Q Can you name some of the State officials?

8 A There's -- I need to -- hold on.

9 [Witness conferring with counsel.]

10 Mr. Warrington. [REDACTED] can you clarify the question? Just,  
11 it's a little confusing, and I think if we narrow exactly what  
12 you're looking for, I think he could probably give you an answer  
13 that's what you're looking for.

14 [REDACTED] Yep. That's perfectly fine. I'm happy to do  
15 that.

16

BY [REDACTED]

17 Q Before we do that, though, actually, what was the title  
18 you had when you were hired by the Trump reelection campaign back  
19 in 2019?

20 A Senior advisor.

21 Q Anything else or just "senior advisor"?

22 A Just "senior advisor."

23 Q Did it ever change, your title?

24 A Not officially.

25 Q Did it change unofficially?

1           A    It was quoted in the newspaper as "director of election  
2 day operations."

3           Q    Did you have those responsibilities, directing election  
4 day operations, for the Trump campaign at any point?

5           A    Yes.

6           Q    When did you begin those responsibilities?

7           A    When I began working on the campaign.

8           Q    Who did you report to when you started at the campaign  
9 in springtime 2019?

10          A    Justin Clark.

11          Q    Did that ever change throughout your time working for  
12 the Trump reelection campaign?

13          A    No.

14          Q    And we're going to get into some other folks, as well,  
15 as we go through this deposition, but did you ever report to Rudy  
16 Giuliani when he began working with the campaign after the  
17 election?

18          A    No.

19          Q    Did you ever interact with Mr. Giuliani?

20          Mr. Warrington. One moment, [REDACTED]

21          Mr. [REDACTED]. Okay.

22               [Witness conferring with counsel.]

23          Mr. Warrington. You're talking about -- what period of  
24 time are you talking about, [REDACTED] just so I can clarify?

25          Mr. [REDACTED]. Well, I guess at any point during his time



1 working on the campaign, so either before the election or after.

2 Mr. Warrington. Well, let's break that up into two  
3 questions.

4 [REDACTED] Sure.

5

BY M

6 Q Let's do before the election.

7 A I don't believe I had any interaction with him before  
8 the election.

9 Q And what about after the election? Did you have any  
10 interactions with Mr. Giuliani after the November 2020  
11 Presidential election?

12 A On the advice of counsel, I assert my constitutional  
13 privilege under the Fifth Amendment and respectfully decline to  
14 answer the question.

15 Q Understood.

16 Mr. Warrington. And, [REDACTED] for shorthand, as we've done  
17 before, as the assertion is -- or, as the privilege is asserted,  
18 can we just use the shorthand of "the Fifth"?

19 [REDACTED] That's perfectly fine, yeah. If you say "the  
20 Fifth," we'll understand what that means moving forward.

21 Mr. Warrington. Okay.

22

BY [REDACTED]

23 Q So, to get back to one of the questions we had before  
24 a brief sidebar you had with counsel, you mentioned interacting  
25 with various State officials during your time working for the

1 Trump reelection campaign.

2 Starting first with Pennsylvania, which State officials in  
3 Pennsylvania did you primarily interact with in your job working  
4 for Trump campaign?

5 Mr. Warrington. [REDACTED], can we break that up into time  
6 periods?

7 [REDACTED] Sure.

8 BY [REDACTED]:

9 Q Before the election?

10 A Yeah. I -- can you --

11 [Witness conferring with counsel.]

12 Mr. Roman. So one of the things that I was doing was  
13 tracking legislation that would affect the election code. So  
14 if a particular bill was introduced, I would often call either  
15 the sponsor or cosponsor of the bill to get a flavor of the bill  
16 and what they thought the possibility was of it moving into  
17 committee/out of committee.

18 There were a number of bills that were introduced in  
19 Pennsylvania and other States that would've had sponsors and  
20 cosponsors. I don't recall all of the officials that I would've  
21 called -- that I called, but it would've been dictated by the  
22 person that either introduced or cosponsored a bill.

23 BY [REDACTED]:

24 Q Okay. Did you have any communications with State  
25 officials in Pennsylvania before the election outside of that,

1 kind of, bill tracking?

2 A I have a number of friends who hold titles in  
3 Pennsylvania that I'm sure I had conversations with. None that  
4 I was reaching out to that I recall for specific purposes outside  
5 of legislation.

6 Q Okay. And we're not so interested, I guess, in the,  
7 kind of, friendly communications you would've had, but more so  
8 the communications you had that are relevant for your role  
9 working on the Trump reelection campaign. I appreciate you  
10 making that distinction as well.

11 What about after the Presidential election? What were the  
12 nature of your communications with State officials in  
13 Pennsylvania like then?

14 A The Fifth.

15 Q After the campaign -- or, excuse me, after the  
16 Presidential election in November, who were the primary State  
17 officials that you were interacting with in Pennsylvania?

18 A The Fifth.

19 Q And some of this we'll get back to as well.

20 Other than tracking legislation, understanding changes or  
21 potential changes to election codes in various States, what other  
22 responsibilities did you have before the election working with  
23 the Trump campaign?

24 A I was also monitoring changes to the code through  
25 administrative orders, through emergency COVID protocols. I

1 was working on putting together plans for the way an election  
2 was conducted in a particular -- any particular State.

3 Q Okay. Anything else that can you recall?

4 A Not at this moment.

5 Q You said you reported to Justin Clark. Were you taking  
6 direction from anybody else working with the Trump reelection  
7 campaign before the election?

8 A Direction?

9 Q Correct.

10 A Can you clarify "direction"?

11 Q Yeah, sure. Was there anybody else within the Trump  
12 reelection campaign who were asking you to do tasks, take on  
13 certain events, certain projects, things like that?

14 [Witness conferring with counsel.]

15 Mr. Roman. Ready?

16

BY

17 Q Yep. Go ahead. You took a moment with Mr. Warrington,  
18 but you're back now.

19 A I was often asked to contact stakeholders -- RNC  
20 members, State chairs -- who were interested in election day  
21 operations to hear them out.

22 Q Of those stakeholders, what were the types of things  
23 that you recall hearing before the election? What was the  
24 interest, the discussions about, with respect to election day  
25 operations?

1           A   Many of the questions were, are we doing anything in  
2   their State? Often the answer was no. And in the ones where  
3   we did have operations, I would normally give them information  
4   for who the State director was.

5           Q   Can you describe for us the types of activities that  
6   these stakeholders were interested in? When they asked you, are  
7   you, Mr. Roman, or the Trump campaign doing something in our  
8   State, what specifically would you have in mind when you answered  
9   that question "no"? Or, if there was something going on, what  
10  were those things?

11          Mr. Warrington. And, to be clear, we're talking about  
12  prior to the election.

13          [REDACTED] That's correct. Thank you, Mr. Warrington.

14          Mr. Roman. Would we have an apparatus in place if a voter  
15  had a concern about voting, if they were unable to cast a ballot,  
16  if they had concerns about long lines at polling places due to  
17  previous history, if they had concerns about changes in the  
18  election code that may disrupt the normal election procedure.

19          It was a lot of drilling down into the mechanics of the  
20  electoral process and what the campaign was doing to ensure that  
21  every voter that was coming out was able to cast a ballot and  
22  that illegal ballots, if there were any, would be identified.

23

BY [REDACTED]

24          Q   From your previous answer, it sounds like in some States  
25  the Trump campaign was active with respect to those types of

1     efforts and some States there was no activity in. Is that  
2     correct?

3             A    Yes.

4             Q    How did the campaign or you choose which States to be  
5     active in with those types of efforts that you just described?

6             A    I did not choose the States that we were operating in.

7             Q    Do you know who did?

8             A    No.

9             Q    Which States were those operations going on in that you  
10    recall before the election?

11            A    Sure. Pennsylvania, Florida, Georgia, Michigan,  
12    Wisconsin, Ohio, Minnesota, Montana, Arizona, New Mexico,  
13    Nevada, New Hampshire, Maine. That's all I recall.

14            Q    All right. And do you know why those States were  
15    selected in particular for those types of activities that you  
16    described earlier?

17            A    Those were target battleground States.

18            Q    Sounds like other, kind of, State chairs or party  
19    officials reached out to you in this pre-election period asking  
20    if there were activities like that going on in their States and  
21    you said no. Do you remember the States where there weren't  
22    those types of activities?

23            A    Every other State except for the ones that I mentioned  
24    we did have activity.

25            Q    I see. Okay.

1 I'm going to pause there just to see if anybody else has  
2 any questions along the lines of what we just went over.

3 [REDACTED] Nope, nothing from me.

4 [REDACTED] Okay.

5 BY [REDACTED]

6 Q All right. I do want to, more generally, go into some  
7 of the accounts that you used as well as the means of  
8 communications that you had.

9 I understand that your Twitter handle, at least from the  
10 period of November 2020 through January of 2021, which is  
11 primarily our focus here, was @mikeroman. Is that correct?

12 A Yes.

13 [REDACTED] Actually, could I ask one clarifying question?

14 [REDACTED] Sure.

15 [REDACTED] Mr. Roman, at the outset of the deposition,  
16 you spelled your name for the record, and I thought I heard you  
17 spell it R-o-m-, Echo, November, rather than Alfa, November.  
18 Which of those is accurate?

19 Mr. Roman. If I did that, that was a flub on my part.

20 [REDACTED] Great. So R-o-m-a-n is the correct spelling  
21 of your last name?

22 Mr. Roman. Yes, ma'am.

23 [REDACTED] Okay. Thank you.

24 BY [REDACTED]

25 Q Other than that @mikeroman Twitter handle, did you use

1 any other Twitter handles to communicate or post information on  
2 Twitter?

3 A No.

4 Q And did you use a phone number in that same period, so,  
5 again, November 2020 through January 2021, with area code [REDACTED]  
6 that ended in [REDACTED]? I'd rather not put the entire number on the  
7 record, if you recognize that number. So did you use a number  
8 like that?

9 A Yes.

10 Q And did you use that number to send or receive text  
11 messages related to the election?

12 A Yes.

13 Q Was your email for the Trump reelection campaign  
14 mroman@donaldtrump.com?

15 A I believe that's correct, yes.

16 Q And we also understand that you had an email account that  
17 was a variation of your name ending in [REDACTED]. Again,  
18 I'm not going to put the entire email address on the record. But  
19 do you remember using an email address with the domain  
20 [REDACTED]?

21 A That's my personal email address. And I did receive  
22 emails, and I attempted to push those people to my DJT email.

23 Q So, if it was related to campaign issues, you would try  
24 to push anybody who contacted you at that email address to your  
25 official email account?



1 A Yes.

2 Q And you produced to the select committee several  
3 messages that appear to be from a Signal account. Is that right?  
4 Did you have a Signal account that you used in that time?

5 A Yes.

6 Q And is that linked to the phone number ending in [REDACTED] ?

7 A I believe so, yes.

8 Q Did you use any other encrypted applications to  
9 communicate with anybody between November 2020 and January 2021?  
10 I'm thinking of Wickr, WhatsApp. I suppose Facebook could fit  
11 in that category. Any of those?

12 A Wickr.

13 Q And was that account, Wickr account, was that also  
14 associated or linked to your phone number ending in [REDACTED] ?

15 A I don't believe so.

16 Q Okay. Is that linked to a phone number?

17 A I don't believe so.

18 Q Is it linked to an email account?

19 A Yes.

20 Q And is that linked to your email account [REDACTED] ?

21 A Yes.

22 Q Any other applications, phone numbers, or email account  
23 that you used to communicate that would be relevant to the  
24 November 2020 election in that timeframe we just identified?

25 A I did have an alternate phone number that I used for the

1 campaign.

2 Q Do you still use that phone number?

3 A No.

4 Q What was that phone number, if you remember?

5 A I do not remember.

6 Q Do you remember what the area code was?

7 A It was either -- I don't recall.

8 Q Okay.

9 A It was either [REDACTED] or [REDACTED].

10 Q Okay. So a D.C.-area-type phone number?

11 A Yes.

12 [Witness conferring with counsel.]

13

BY [REDACTED]

14 Q We spoke a little bit about your role before the  
15 campaign, and you gave us -- oh, I see you're consulting with  
16 Mr. Warrington.

17 Mr. Warrington. Sorry about that, [REDACTED]

18 [REDACTED] No, that's quite all right. I just want to  
19 give you enough time, whatever you need.

20

BY [REDACTED]

21 Q I saw -- or we spoke a little bit earlier about your  
22 role --

23 Mr. Warrington. One second, [REDACTED].

24 [REDACTED] Yep. Take your time.

25 [Witness conferring with counsel.]

1           Mr. Warrington. All right, [REDACTED], we're back. Sorry.

2           [REDACTED] Nope. That's quite all right.

3           BY [REDACTED]

4           Q    Okay. So we spoke a little bit earlier about your role  
5           and some of your job duties or functions on the Trump campaign  
6           before the election. Did have you a formal role with the Trump  
7           reelection campaign, or whatever that entity became, after the  
8           November 3rd Presidential election?

9           A    Fifth.

10          Q    I really couldn't hear you there. I'm sorry. Did you  
11          say "Fifth"?

12          A    Yes.

13          Q    Okay.

14          Between November 3, 2020, and January 2021, did you ever  
15          participate in any discussions involving Sidney Powell or Jenna  
16          Ellis related to election fraud or irregularities in the 2020  
17          election?

18          A    The Fifth.

19          Q    In that post-election period between November 3, 2020,  
20          and January 20, 2021, did you have any conversations with any  
21          White House officials, including President Trump, related to  
22          potential election fraud or other irregularities in the 2020  
23          election?

24          A    The Fifth.

25          Q    Did you, Mr. Roman, have any role investigating

1     allegations related to purported election fraud or  
2     irregularities in the 2020 election after the election took  
3     place?

4             A     The Fifth.

5             Q     The same period, post-election through January 20,  
6     2021, did you have any conversations with any elected officials,  
7     whether at a State, local, or Federal level, regarding election  
8     fraud or irregularities in the election?

9             A     The Fifth.

10            Q     Did you ever talk with anybody at the Department of  
11    Homeland Security in that post-election period, November 3rd  
12    through January 20th, about the election or any purported fraud  
13    or irregularities?

14            A     The Fifth.

15            Q     Same period, between November 3, 2020, and January 20,  
16    2021, did have you any conversations with current or former  
17    officials at the Department of Justice regarding purported  
18    election fraud or irregularities in the 2020 Presidential  
19    election?

20            A     The Fifth.

21            Q     And do you have in your possession, Mr. Roman, evidence  
22    of widespread fraud that actually affected the outcome of the  
23    2020 Presidential election?

24            A     The Fifth.

25            Q     Where were you on election day, so November 3, 2020?

1 [Witness conferring with counsel.]

2 Mr. Warrington. So, [REDACTED], I think, with regard to that  
3 question, there's been some -- I don't know if your question has  
4 been informed by some press articles. In particular, there's  
5 one, I believe it was a Politico article, that is just flat wrong.

6 But you and I can talk about that offline. Or, after the  
7 deposition, I can give you some background on that.

8 Mr. [REDACTED] Okay. Yeah, I'd be interested in hearing what  
9 it is you have to say about that.

10 But for Mr. Roman, so are you instructing him not to answer?  
11 Or -- I shouldn't put that it way, but I just -- I guess I'll  
12 just renew my question.

13

BY [REDACTED]

14 Q Regardless of whatever's been reported, where were you,  
15 Mr. Roman, on election day?

16 Mr. Roman. The Fifth.

17 [REDACTED] And, Mr. Warrington, I'll follow up with you,  
18 then, afterwards.

19 Mr. Warrington. Yes.

20 [REDACTED]. Okay.

21

BY [REDACTED]:

22 Q I'm going to show you some exhibits, Mr. Roman, like we  
23 brought up before on the screen. The first is exhibit No. 3.

24 All right. Can you see that, what we pulled up as exhibit  
25 No. 3?

1 A Yes.

2 Q All right. This is an email from Mike Roman to Alex  
3 Cannon. Do you know who Alex Cannon is?

4 A Yes.

5 Q Who is that?

6 A The Fifth.

7 Mr. Warrington. [REDACTED], can we see the entire document?

8 [REDACTED]. Of course. Let's scroll down.

9 And then the only thing on that second page is just that  
10 Trump Victory signature block.

11 Mr. Warrington. Okay. Thank you.

12 BY [REDACTED]

13 Q So this is an email exchange between you and Alex Cannon  
14 late on the evening of November 5th and into the morning of  
15 November the 6th.

16 A I'm sorry. Could you repeat that? I couldn't hear  
17 you.

18 Q Yes, of course. And it wasn't a question yet.

19 But this is an email exchange between you and Alex Cannon  
20 late on the evening of the 5th and into the morning of the 6th.  
21 And it begins with a report sent by an RNC employee to Mr. Cannon  
22 providing a comparison of the 2020 Presidential election results  
23 in four cities to those same cities' results in 2016 and 2012.  
24 That's that chart there at the bottom.

25 The RNC employee notes that, quote, "ATL is higher in 2020,

1 but GA has approximately 2 million more voters on their rolls  
2 compared to 2016."

3 And then just further describing this, in the top email  
4 there -- if you could zoom in a little bit so Mr. Roman can see  
5 it. Yep.

6 In that top email, you wrote, quote, "Only Atlanta  
7 overproduced in raw votes. The margin was higher in three of  
8 four. Not sure that satisfies the narrative."

9 And so my question to you is: In this email, why was the  
10 focus these four cities -- Philadelphia, Atlanta, Milwaukee, and  
11 Detroit? And, again, this email exchange is dated between  
12 November 5th and November 6th of 2020.

13 A The Fifth.

14 Q And, then, in that email, you say, "Not sure that  
15 satisfies the narrative." What was the narrative you're  
16 referring to here in response to Mr. Cannon's email?

17 A The Fifth.

18 Q You can take that down. Thank you.

19 When was first time you recall using language like "stop  
20 the steal" or referring to the election as potentially being  
21 "stolen" in relation to the 2020 Presidential election?

22 A The Fifth.

23 Q Can we pull up exhibit 24, please?

24 And while that's coming up, were you ever directed to or  
25 asked to use language like the election is "going to be stolen"

1 or it "will be stolen" before the Presidential election ever  
2 occurred?

3 A The Fifth.

4 Q Exhibit 24 -- can you see that there? -- it's a tweet  
5 from your @mikeroman account.

6 A The Fifth.

7 Q Okay. The first thing I just want to make sure is you  
8 can see it. Can you see what we've shown as exhibit No. 24?

9 A Yes, sir.

10 Q Okay.

11 Mr. Warrington. Can we see the whole document, [REDACTED]

12 [REDACTED] Yes. This is just one page. I think you're  
13 seeing the whole thing. You are.

14 Mr. Warrington. Okay. Thank you.

15 BY [REDACTED]

16 Q And this is a tweet dated July the 1st of 2020, so a few  
17 months before the election, in which you said that now President  
18 Biden and others were going to recruit goons to, quote, "steal  
19 the election."

20 Were you asked by anyone in the Trump reelection campaign,  
21 White House, or otherwise to put out tweets like this July 2020  
22 tweet even before the election occurred?

23 A The Fifth.

24 Q And what information did you have in July 2020, around  
25 the time you sent this tweet, to support the claim that the



1 election was going to be stolen?

2 A The Fifth.

3 Q If we could pull up exhibit No. 4, please.

4 Okay. Can you see what we've pulled up on the screen as  
5 exhibit 4?

6 A Some of it.

7 Q Okay. Let's scroll down. This is only one page. I'll  
8 represent to you there is a page 2 but it's only the byline, or  
9 the signature line, "Paid for by Donald J. Trump for President."  
10 We can show that to you quickly.

11 So, in this email, it looks like a mass mailing email sent  
12 by the campaign on November 7, 2020, a little less than a month  
13 before the Presidential election. And the "from" line includes  
14 your name, Mike Roman, National EDO Director, from an email  
15 address @team.donaldtrump.com. And the subject line is "Stop  
16 election fraud."

17 The first question I have for you: Did you write this  
18 email?

19 A The Fifth.

20 Q Because this looks, at least to me, like it's kind of  
21 a mass, like, marketing or outreach email. Did you have any role  
22 in approving this message before it went out using your name,  
23 from Mike Roman, National EDO Director?

24 A The Fifth.

25 Q The email starts, it says, "Election fraud is real."

1 That first paragraph there under the name "Laura," it says, "The  
2 Democrats are busy changing the way ballots are cast and counted  
3 in order to create chaos and confusion. Their goal is to steal  
4 this election from the American people. They want to steal from  
5 you."

6 What evidence did you or the campaign have that you're aware  
7 of at this time in October of 2020 that Democrats were motivated  
8 by creating, quote, "chaos and confusion" and were going to have  
9 a goal of stealing the election?

10 A The Fifth.

11 Q All right, you can take that down. Thank you.

12 All right. So I want to go to some tweets from election  
13 day itself.

14 If we could pull up exhibit No. 5.

15 This is just one page as well. This is a tweet from your  
16 account on November 3, 2020, which is election day, at 9:12 in  
17 the morning is the timestamp.

18 And it says, "Illegal campaigning inside of a polling  
19 location in Philly. Man in blue is handing out Dem literature  
20 to voters in line to vote. This is why Dems are keeping Trump  
21 watchers out. They are stealing it. This needs to stop."

22 Did you take either of the pictures that appear in this tweet  
23 from your account on November 3rd?

24 A The Fifth.

25 Mr. Warrington. [REDACTED] can we see the entire -- that may

1 be --

2 [REDACTED] This is the whole thing.

3 Mr. Warrington. Yeah.

4 [REDACTED] Yep, that's the whole thing.

5 Mr. Warrington. It's just, where the sound bar is on the  
6 screen, it actually kind of covered up the bottom.

7 [REDACTED] Oh, I see what you're saying. I apologize.

8 Mr. Warrington. No, that's fine. I think it's on our end.

9 Sorry about that.

10

BY [REDACTED]

11 Q Did anyone encourage you to tweet about the election  
12 being stolen the afternoon of election day, so on election day  
13 itself?

14 A The Fifth.

15 Q Did you do anything to investigate the activity you  
16 tweeted about here in this tweet in exhibit No. 5?

17 A Fifth.

18 [REDACTED] Could I ask --

19 [REDACTED] Yep.

20 [REDACTED] Mr. Roman, do you have any information about  
21 whether the two photos that appear side-by-side in this tweet  
22 were actually taken at the same -- of the same instance?

23 Mr. Roman. The Fifth.

24 [REDACTED]. You can take that down. Thank you.

25

BY [REDACTED]

1           Q   What's your understanding about how the Trump campaign  
2   investigated allegations of alleged election fraud in the  
3   November 2020 Presidential election after the election took  
4   place?

5           A   The Fifth.

6           Q   Do you have any proof, Mr. Roman, of widespread  
7   intentional vote flipping using any voting machines, including  
8   Dominion voting machines?

9           A   The Fifth.

10          Q   Do you have proof that enough dead people voted in any  
11   State or a combination of States to change the outcome of the  
12   election?

13          A   The Fifth.

14          Q   Do you have proof that any purported irregularity in the  
15   Presidential election actually changed the election in any  
16   State?

17          A   The Fifth.

18          Q   I do want to pull up exhibit No. 9.

19               All right. Can you see that we've pulled up exhibit No. 9  
20   on your screen?

21               And if we go to the bottom of page 1 -- this is just a one-page  
22   email as well, or one-page exhibit I should say. If you zoom  
23   in just a little bit at the bottom so we can see the -- it's a  
24   December 18th email.

25               Can you see what we're showing you here as exhibit No. 9?

1           A    Yes.

2           Q    All right.  So this first email is from somebody named  
3   James Fitzpatrick at Donald Trump -- or, excuse me, with the  
4   email address jfitzpatrick@donaldtrump.com.

5           Who's James Fitzpatrick?

6           A    The Fifth.

7           Q    All right.

8           The subject line of this email exchange, as you can see there  
9   in the bottom email, is "Updated fraud examples in Arizona,  
10   Pennsylvania, Michigan, Wisconsin, New Mexico, Nevada,  
11   Georgia."  Looks to be a file name .doc, meaning "document."  
12   And Mr. Fitzpatrick told you, "See attached" -- excuse me -- sent  
13   this to you, yes, and said "See attached."

14          And then, if we go up, you forward it along to somebody named  
15   Jason Miller.  And Mr. Miller responds, "Thank you, Mike."  And  
16   he asks you a question:  "Safe to say this takes the best verified  
17   examples we have from you, Navarro, Cleta, etc, and this is our  
18   top-shelf stuff, you'd be fine with our distributing publicly?"

19          And if we go up one more -- still on the 18th.  And then  
20   on, at least according to this timestamp, which is the 19th at  
21   1:30 a.m., you write back to Mr. Miller, copying Mr. Boris  
22   Epshteyn, saying, "This is the stuff we can validate, either a  
23   news article or a credible affidavit."

24          Do you recognize this email exchange that we have here as  
25   exhibit No. 9?

1           A    The Fifth.

2           Q    In this email, based on what you recall and the  
3   attachment and discussion surrounding it, is this the most  
4   comprehensive record of the results of your and the campaign's  
5   efforts to compile and validate allegations of fraud that arose  
6   in the 2020 Presidential campaign?

7           A    The Fifth.

8           Q    You can take that down. Thank you.

9           So we understand that, eventually, Rudy Giuliani and a team  
10   that worked with him took over the campaign's post-election-day  
11   legal team. How did that affect your responsibilities, if any?

12          A    The Fifth.

13          Can we take a break to get some coffee?

14          Mr. Warrington. [REDACTED] could we just take about a 30-second  
15   break to get some coffee?

16          [REDACTED] Yeah, of course. You want to just say  
17   5 minutes --

18          Mr. Warrington. Sure.

19          [REDACTED] -- for a coffee break?

20          Mr. Warrington. Yeah.

21          [REDACTED] All right. Then we'll go off the record and  
22   take 5 minutes.

23          Mr. Warrington. Okay.

24          [Recess.]

1

2 [11:00 a.m.]

3

BY [REDACTED]

4

Q It's 11:00 a.m., and we are resuming the deposition of Mr. Michael Roman.

6

7

8

9

10

I was about to go through a list of people and ask if you discussed anything with them after Mr. Giuliani took over kind of the legal efforts on the campaign or after election day more generally. So I'm just going to list them all and see if you communicated with any of them.

11

12

13

So did you communicate after the election with Sidney Powell, Cleta Mitchell, Jenna Ellis, John Eastman, Christina Bobb, Ken Chesebro, or Jack Wilenchik?

14

A The Fifth.

15

16

17

18

Q Okay. I would ordinarily ask you to describe any communications you had with each, but I'm going to assume, based on your answer to the last question, that you will assert a privilege to that question. Is that correct?

19

A Yes.

20

21

22

23

Q Going back to the pre-election period, so before November 3rd, 2020, what was your understanding of the role of State legislatures in the process of electing the President of the United States in choosing the electoral college electors?

24

Mr. Warrington. We're pre-election, right?

25

[REDACTED] Pre-election, correct.

1           The Witness. I was not focused on that?

2           BY [REDACTED]

3           Q    Okay. So you weren't focused on it. Did it come up at  
4 any point that you recall before the November election?

5           A    No.

6           Q    I assume I know the answer to this question, but are you  
7 aware of any discussions before the election about the Trump  
8 campaign potentially encouraging State legislatures in  
9 battleground States to appoint Trump electors. So, again,  
10 discussions before the November 3rd election?

11          A    The Fifth.

12          Q    And, to the extent there were those discussions, who was  
13 involved in any such discussions before the election about the  
14 Trump campaign potentially encouraging State legislatures to  
15 choose Trump electors?

16          A    The Fifth.

17          Q    Did you ever participate in any efforts to encourage  
18 State legislators in Pennsylvania or elsewhere to select Trump  
19 electors in States that Mr. Trump had lost?

20          A    The Fifth.

21          Q    Pull up exhibit No. 7, please.

22               All right. So these are --

23          Mr. Warrington. What's the exhibit number on this?

24          [REDACTED] This is No. 7.

25          Mr. Warrington. 7?



1 [REDACTED] Yeah. You produced this to us. It is  
2 starting Bates Roman 19 through Roman 26.

3 BY [REDACTED]:

4 Q Okay. These are approximately, based on my rough  
5 count, 25 messages that you exchanged with someone named Matt  
6 Stroia between November 21st and December 4th. Were these  
7 messages sent via Signal from your phone?

8 A The Fifth.

9 Q And, just to be clear, these messages are messages that  
10 you provided to the committee itself. Are you going to  
11 take -- assert the Fifth amendment to any questions about these?

12 Mr. Warrington. Not to interrupt, [REDACTED] but if your  
13 questions is, if he's going to do that, I'm going to  
14 let -- obviously let him answer, but I just want to make sure  
15 that's -- you're talking about this string of emails or texts?

16 Mr. [REDACTED] That's correct. On this exhibit in  
17 particular.

18 The Witness. The Fifth.

19 BY MR. [REDACTED]

20 Q Maybe I will just ask you more generally then. Outside  
21 the context of this exhibit, who is Matt Stroia?

22 A The Fifth.

23 Q I understand that somebody named Matt Stroia was the  
24 chief of staff to Representative Mike Kelly at the time, so, in  
25 the November, December and January period that we've been talking

1       about. Is that your understanding as well?

2               A    The Fifth.

3               Q    We go to page 3 of this exhibit, which is Bates stamped  
4       Roman 0021. It shows a message that Mr. Stroia sent to you on  
5       November the 22nd. And it looks like this message relates to  
6       purported legislative hearings -- or excuse me -- a purported  
7       legislative hearing held a few days later in Gettysburg,  
8       Pennsylvania, and it is talking about: Rudy we are hoping it  
9       turns out -- excuse me -- Mr. Stroia said: I hope it turns out  
10      like we envisioned. We need to make -- oh, excuse me -- we need  
11      to push hard to make it in person.

12              And you respond about the Federal courthouse maintained by  
13      GSA.

14              What role did Mr. Stroia play in organizing election fraud  
15      hearings or purported hearings in Pennsylvania around this time?

16              A    The Fifth.

17              Q    My followup question, what was your role in coordinating  
18      or arranging or organizing any hearings in Pennsylvania around  
19      this time?

20              A    The Fifth.

21              Q    If we go to page 4 of this exhibit, again, you produced  
22      these messages to us. And this is Bates stamped Roman 0022, this  
23      shows the messages exchanged again between you and Mr. Stroia  
24      now on November 8, 2020. You ask: Who briefed the PA House  
25      caucus last name Adams.

1           Mr. Stroia says: I have no idea. Could it be the general  
2 counsel for the speaker?

3           You respond: No, apparently, it is Michael Adams, the SOS  
4 from Kentucky. Does that make sense? And it doesn't sound like  
5 this went well.

6           And you attach an apparent screen shot of several other  
7 messages in which somebody says: Maybe the Trump campaign  
8 should get some actual evidence of fraud and file in court.  
9 They've been horrible in their court filings. We just got a  
10 report from their legal team. They told us on caucus they have  
11 zero evidence.

12           What do you know about the briefing discussed here in which  
13 the apparent secretary of state from Kentucky briefed the  
14 Pennsylvania House caucus?

15           A    The Fifth.

16           Q    And who sent you the messages that you took a screen shot  
17 of and sent them to Mr. Stroia that are shown here on Bates No.  
18 Roman 0022?

19           A    The Fifth.

20           Q    The embedded message says that, quote, they told us in  
21 caucus they have zero evidence, end quote. Are you aware of such  
22 a statement by any members of the Trump campaign team or the Trump  
23 campaign legal team on which Mr. Giuliani worked?

24           A    The Fifth.

25           Q    Did you ever hear Mr. Giuliani or anybody else

1 associated with the campaign indicated that Mr. Giuliani and his  
2 team didn't have evidence but did have theories about the  
3 election and purported fraud?

4 A The Fifth.

5 Q On page 7 of this same exhibit, exhibit 7, and this is  
6 page Roman 0025, for the record. Mr. Stroia said: The mayor  
7 may be calling you. Christina told me he's wanting to talk to  
8 me about Pennsylvania. My mind is in no shape to talk with him  
9 right now. I told him that you will know everything I do. Did  
10 you speak with Mr. Giuliani on or about December 4th about  
11 election issues in Pennsylvania?

12 A The Fifth.

13 Q Do you know why Mr. Giuliani would have been calling Mike  
14 Kelly's chief of staff, Mr. Stroia, about Presidential election  
15 issues rather than you, who was acting as the director of election  
16 day operations for the campaign?

17 A The Fifth.

18 Q In this message it mentions Christina. Is that  
19 Christina Bobb?

20 A The Fifth.

21 Q Do you know how often Mr. Stroia interacted with Ms.  
22 Bobb?

23 A The Fifth.

24 Q Did Mr. Stroia or Representative Kelly assist in any  
25 efforts to have State legislators choose Trump electors in

1 Pennsylvania after the November 2020 election?

2 A The Fifth.

3 Q Did you ever talk to Representative Kelly about having  
4 Pennsylvania State legislature choose Trump electors?

5 A The Fifth.

6 Q If we go to exhibit No. 8. This is another exchange that  
7 you provided to us. And that's Bates stamped Roman 0004 through  
8 Roman 0012. And these are messages somebody named Katherine  
9 Friess. Can you see the exhibit that we put up on the screen  
10 there, at least the first page of it?

11 A I can't see all of it.

12 Q Okay. We can zoom in to relevant portions there.

13 Again, these are nine pages of texts you exchanged with Ms.  
14 Friess between November 24th and January 1st, and it is  
15 approximately 30 messages. Were these sent through your Signal  
16 account or sent or received with your Signal account, I should  
17 say?

18 A The Fifth.

19 Q And, again, I would just note for the record that,  
20 because you produced these to us, we think that these are fair  
21 game for questioning outside of any Fifth Amendment privilege  
22 assertion. I understand you are asserting the Fifth. If you'd  
23 like a moment to talk to Mr. Warrington about that, that's  
24 perfectly fine, and take as much time as you need, but that is  
25 the committee's position.

1           Mr. Warrington. I understand the committee's position.  
2       And I think our position is laid out in our prior correspondence  
3       with the chairman.

4           [REDACTED]. Okay. Thank you, Mr. Warrington.

5           BY [REDACTED]

6           Q   All right. So just a few questions to follow up on this  
7       for the record here. Is this Katherine Friess, who assessed Rudy  
8       Giuliani's legal team?

9           A   The Fifth.

10          Q   In the message on page 2, go to page 2, Ms. Friess says:  
11       In your inbox, my guys and then lists a few people. Stisogis,  
12       Colonel Waldron, Kim Peterson, Charles Nudo, and his 84-year-old  
13       mother-in-law. It appears she's sending information about  
14       potential witnesses for Pennsylvania election fraud hearings.  
15       Is that correct?

16          A   The Fifth.

17          Q   And what was her role in setting up the purported  
18       hearings in Pennsylvania?

19          A   The Fifth.

20          Q   Who, if anyone, was responsible for investigating the  
21       allegations of election fraud or irregularities that came up or  
22       that were presented by witnesses at that hearing?

23          A   The Fifth.

24          Q   On page 5 of this exhibit, which for the record is Roman  
25       0008, Ms. Friess says that she's on with Bernie, just shared.

1 Thanks a bunch.

2 Do you understand that to be Bernie Kerik?

3 A The Fifth.

4 Q On the next day, December 27th, she says: Tracking  
5 something down for the mayor and POTUS. Have you seen anything  
6 that shows over vote numbers from Michigan or Pennsylvania,  
7 especially Pennsylvania, and/or Detroit, Philly, Pitt? Thanks  
8 so much.

9 You respond and say: I know. We were looking at this as  
10 we were discussing recounts. Let me see where it was left.

11 They says: Thanks a million.

12 And then the next day you say: Saw POTUS' tweet. Is that  
13 what you were referring to?

14 And, if we go on to the next page, which is Roman 9, she  
15 in the middle of the page responds and says: Yep, thanks.

16 There is a tweet that the President issued on December 28th  
17 I will represent to you, Mr. Roman. It says: In Pennsylvania,  
18 there were 2,005 -- excuse me -- 205,000 more votes than there  
19 were voters. This alone flips the State to President Trump.

20 Is this the tweet you remember seeing when you wrote on  
21 December 28th "saw POTUS tweet"? Is that what you were referring  
22 to?

23 A The Fifth.

24 Q You also said that your team had been looking at this.  
25 Did you ever learn that this issue of 205,000 alleged over votes

1 was debunked and that there weren't such over votes in  
2 Pennsylvania?

3 A The Fifth.

4 Q Did you ever have any discussions with the President or  
5 anybody on the campaign, including Mr. Giuliani and his team,  
6 that this over vote allegation had in fact been debunked?

7 A The Fifth.

8 Q On page 7 of this exhibit, which is Roman 0010, Ms.  
9 Friess mentioned Mastriano. Did you understand that to be State  
10 Senator Doug Mastriano?

11 A The Fifth.

12 Q Did you, Mr. Roman, ever speak with State Senator Doug  
13 Mastriano about the election?

14 A The Fifth.

15 Q Did you ever speak to State Senator Doug Mastriano about  
16 the joint session of Congress on January 6th?

17 A The Fifth.

18 Q Did you ever speak to Senator Mastriano about his  
19 presence in Washington, D.C., on January the 6th?

20 A The Fifth.

21 Q All right you can take this down. Thank you.

22 Did you have any role directing Trump campaign staffers or  
23 volunteers to make calls to Republican State legislators after  
24 the November election?

25 A The Fifth.



1           Q   Did you have any role in drafting or approving scripts  
2   that such staffers or volunteers would use when speaking with  
3   Republican State legislators after the election?

4           A   The Fifth.

5           Q   I do want to show you exhibit No. 10.  If you can zoom  
6   in a bit.  Showing you exhibit No. 10, can you see the top of  
7   the first page of exhibit No. 10 on your screen?

8           A   Yes.

9           Q   Okay.  So, at the top it says:  Hard sell.  Support the  
10   resolution to appoint electors for Trump.

11           It says:  Basic script.

12           And then it starts with a script that says:  
13   Representative/Senator blank.

14           We can scroll down to show you the rest of this document.  
15   Stop there and just go up.  Good.

16           So part of this script says:  Tomorrow, Mayor Giuliani is  
17   presenting experts and witnesses from Arizona who will show the  
18   vote totals are fatally flawed and do not accurately represent  
19   the will of the voters.

20           It goes on to say:  You have the power to reclaim your  
21   authority to send the slate of electors that will support  
22   President Trump and Vice President Pence.  This is a clear path  
23   to correct the attempted theft of this election.  This effort  
24   is happening in other States where fraud was rampant, including  
25   Pennsylvania, Arizona, and Georgia?

1           There's more to it as well. But do you recognize what this  
2 document is, that says "hard sell, support the resolution to  
3 appoint electors for Trump"?

4           A    The Fifth.

5           Q    As I just read, it includes a mention of Mr. Giuliani  
6 and presenting experts and witnesses from Arizona. Did you have  
7 any role coordinating Mr. Giuliani's appearance before  
8 legislators in Arizona in the post-election period?

9           A    The Fifth.

10          Q    Did you approve any of the language that was included  
11 in this script?

12          A    The Fifth.

13          Q    Do you know if anyone actually called State legislators  
14 to convey the information in this script?

15          A    The Fifth.

16          Q    Were you directed by anyone within the Trump campaign  
17 or White House to make calls like these or have others, campaign  
18 volunteers or staff, make calls like these?

19          A    The Fifth.

20          Q    Did you ever talk to President Trump about calling State  
21 legislators and encouraging them to appoint  
22 Trump electors in States that he had lost?

23          A    The fifth.

24          Q    Did you ever talk to President Trump about other options  
25 for changing or affecting the results of the 2020 Presidential

1 election?

2 A The Fifth.

3 Q Were you involved in any other efforts to urge State  
4 legislatures or State legislators to appoint electors, including  
5 by reconvening for special legislative sessions, if necessary?

6 A The Fifth.

7 Q If we go to exhibit No. 11. This is -- and I'll  
8 start -- excuse me. Can you see the top part of the first page  
9 of what we just pulled up is exhibit No. 11?

10 A Yeah. I can see the top, yes.

11 Q Okay. This is an email exchange between you on December  
12 2nd, 2020, with Tim Murtaugh, Jenna Ellis, Boris Epshteyn, and  
13 G. Michael Brown. The subject line: Michigan reporter  
14 question.

15 And we go to the bottom of page 2. The Michigan reporter  
16 question appears to be: Is the Trump campaign responsible for  
17 emails from Kerrick Kuder and voicemails from Angela McCallum  
18 to Michigan lawmakers, urging them to appoint their own electors  
19 from Jonathan Oosting in Michigan.

20 After several emails, we get back to the near the top of  
21 page 1. Mr. Murtaugh asked you and others: So what is the  
22 answer actually? Is the campaign pushing emails and voicemails?

23 And you respond: The campaign did send emails and  
24 voicemails. MR.

25 Was Tim Murtaugh aware of these calls or emails to State

1       legislators before they happened?

2             A    The Fifth.

3             Q    Jenna Ellis is somebody who is on this email exchange  
4       and who actually weighs in at one point. Was she aware of these  
5       calls and emails either before or as they were happening to State  
6       legislators?

7             A    The Fifth.

8             Q    More generally, whose idea was it to place calls to State  
9       legislators?

10            A    The Fifth.

11            Q    You can take that down. Thank you.

12            Q    Were you involved in any discussions about rerunning the  
13       2020 Presidential election?

14            A    The Fifth.

15            Q    Were you involved in any discussions about seizing  
16       voting machines?

17            A    The Fifth.

18            Q    Were you involved in any discussions about imposing  
19       Martial law related to the 2020 Presidential election?

20            A    The Fifth.

21            Q    And were you involved in any efforts to gain access to  
22       voting machines following the election, including gaining access  
23       through State officials, members of Mr. Giuliani's legal team,  
24       or anybody else?

25            A    The Fifth.

1 Q Are you aware of an individual named Phil Waldron?

2 Mr. Warrington. Just a second, [REDACTED]

3 Mr. [REDACTED]. Sure, take your time.

4 [Witness conferring with counsel.]

5 The Witness. The Fifth.

6 BY MR. [REDACTED]

7 Q Quickly I will show you exhibit No. 26. And this is the  
8 extent of the exhibit. This is Bates stamped R-O-M-A, ending  
9 in 645, a document that you produced. It says: ASOG, Phil  
10 Warren, 200k electronically adjudicated ballots. Novis  
11 software, defaulted ballots to Biden.

12 Can you see the exhibit that we have up there, Mr. Roman?

13 A Yes.

14 Q What is this? This is something you produced.

15 Mr. Warrington. Can you scroll down, [REDACTED]

16 [REDACTED] Yes. This is the extent of the entire  
17 exhibit, but yes.

18 The Witness. What was the question?

19 BY [REDACTED]

20 Q What is this document?

21 A The Fifth.

22 Q In that it says Phil Warren, W-a-r-r-e-n, is that  
23 actually a reference to Phil Waldron, W-a-l-d-r-o-n?

24 A The Fifth.

25 Q All right. You can take that down. Thank you.

1           So we talked a little bit about State legislators choosing  
2   Trump electors in States that Mr. Trump had lost. But,  
3   separately, are you aware of a plan to have Republican electors  
4   meet and cast votes for Donald Trump in States that Mr. Trump  
5   had lost, separate and apart from any efforts related to State  
6   legislatures?

7           A    The Fifth.

8           Q    For ease of use and shorthand, I'm going to refer to the  
9   folks who did that as alternate electors. And so, when I use  
10  that term, that's what I'll be referring to.

11          Why was it necessary for alternate electors to convene in  
12  States that Mr. Trump had lost?

13          A    The Fifth.

14          Q    And what was your role, if any, in having alternate  
15  electors meet in States that Mr. Trump had lost, including  
16  Pennsylvania?

17          A    The Fifth.

18          Q    Did you discuss the alternate electors plan with  
19  President Trump either before or after the electors met and cast  
20  votes on December 14th, 2020?

21          A    The Fifth.

22          Q    Did you discuss the concept of or process for convening  
23  alternate electors in contested States with any of the following  
24  people, Justin Clark, Matt Morgan, Josh Findlay, or Nick Trainer?

25          A    The Fifth.

1           Q   And same question: Did you ever discuss this concept  
2   of or process for convening alternate electors with Rudy  
3   Giuliani, Boris Epshteyn, Jenna Ellis, John Eastman, Bernie  
4   Kerik, Christina Bobb, Judge James Troupis, Mike Brown -- G.  
5   Michael Brown, or Robert Sinners?

6           A   The Fifth.

7           Q   Pull up exhibit No. 12, please.

8           All right. So we're putting up exhibit No. 12. Can you  
9   see the top of the first page of exhibit 12 on your screen?

10          A   Yes.

11          Q   This is a memo to Judge James Troupis from Kenneth  
12   Chesebro or Chesebro, dated November 18th, 2020, in brackets,  
13   12/10 streamlined version, re: The real deadline for setting a  
14   State's electoral votes.

15          And then Mr. Chesebro introduces it by saying: Here is a  
16   summary of my view that the Presidential election timetable  
17   affords ample time for post-election judicial proceedings.

18          Have you ever seen this memo before?

19          Mr. Warrington. Can you scroll through it, [REDACTED]?

20          [REDACTED] Sure.

21          BY MR. [REDACTED]:

22          Q   And if we go back to the top of page 1 and at least scroll  
23   through it, that second paragraph under the summary -- I'll just  
24   read the beginning of it. It says: Assuming the electors  
25   pledged to Trump and Pence end up meeting in a State on December

1 14th to cast their votes and then send their votes to the  
2 President of the Senate in time to be opened on January 6th, a  
3 court decision or perhaps a State legislative determination  
4 rendered after December 14th in favor of the Trump-Pence slate  
5 of electors should be considered timely.

6 So now having scrolled through this and heard at least that  
7 portion of it, do you recognize this memo dated November 18th?

8 A The Fifth.

9 Q Was the portion I just read to you from that second  
10 paragraph on page 1 consistent with what you are told about the  
11 alternate electors and the plan to have them meet?

12 A The Fifth.

13 Q Did you have any concerns about the meeting and casting  
14 votes by alternate electors on December 14th, 2020?

15 A The Fifth.

16 Q If we go to exhibit 13. This is another memo. It is  
17 a separate memo, dated December the 9th, to James Troupis from  
18 Kenneth Chesebro. And it is: Re: Statutory requirements for  
19 December 14th electoral votes.

20 I'll represent to you, as we're scrolling through it, that  
21 Mr. Chesebro in this memo goes through Federal law as well as  
22 various State laws from Arizona, Georgia, Michigan, Nevada,  
23 Pennsylvania, and Wisconsin and talks about the different State  
24 law requirements for the meeting of electoral college electors  
25 related to the Presidential election. Do you recognize this



1 memo shown as exhibit 13?

2 A The Fifth.

3 Q Did you participate in any discussions about legal  
4 issues related to the meetings of Republican electors in various  
5 States?

6 A The Fifth.

7 Q If we go to exhibit No. 15, please, and this is just a  
8 one-page email, if you scroll up a bit -- excuse me, scroll down,  
9 rather. The end is a signature block from Joshua Findlay. Can  
10 you see what we put up as exhibit No. 15?

11 A Yes.

12 Q And this is an email, dated December 11th, 2020, at 5:52  
13 p.m., from Joshua Findlay to John Black, Clayton Henson, B.  
14 Barrett, Jeremy Hughes, Brian Seitchik, copying Kenneth Chesebro  
15 and you, Mr. Roman, with the subject: Presidential electors  
16 litigation in the States.

17 And, in this email Mr. Findlay wrote: Rudy's team has  
18 designated Ken Chesebro as the point person for the legal  
19 documents and Mike Roman as the lead for executing the voting  
20 on Monday. Both are copied here and can assist in resolving  
21 outstanding issues in your State.

22 Is it accurate that Mr. Giuliani designated you as the lead  
23 for executing the voting by alternate electors in advance of  
24 December 14th in the meeting of the electoral college?

25 A The Fifth.

1           Q   And it says that you had been designated as the lead for  
2   executing the voting. How did you execute the effort for the  
3   voting of alternate electors on December 14th?

4           A   The Fifth.

5           Q   We'll go to exhibit No. 16.

6           All right, this is a December 12th email, at least the top  
7   email here. Can you see the top of page 1 for exhibit 16 that  
8   we've put up?

9           A   Yes.

10          Q   All right. We'll scroll down. This is a two-page  
11   email. It starts with an email from you on December 12th to James  
12   Fitzpatrick, Sean Flynn, Jesse Law, Thomas Lane, Valerie  
13   McConaughy, G. Michael Brown, Robert Sinners, and Peter  
14   McKinnes (ph).

15          Are those members of your election day operations staff?

16          A   The Fifth.

17          Q   You can take that down. Thank you.

18          So we understand that the campaign and advisers to the  
19   campaign drafted language for the alternate electors to use in  
20   certificates that were ultimately sent to Congress and the  
21   National Archives. That language indicated that the alternate  
22   electors were the, quote, duly elected and qualified electors  
23   for President and Vice President.

24          Are you aware of anyone who expressed concerns about using  
25   that language?

1           A    The Fifth.

2           Q    It's been reported publicly that Pennsylvania State  
3   Senator Doug Mastriano wanted assurances about the plan for the  
4   alternate electors to meet and cast votes and wanted to speak  
5   directly with Mr. Giuliani to ensure that the plan was legal.  
6   Are you aware of any of Senator Mastriano's concerns about the  
7   alternate electors?

8           A    The Fifth.

9           Q    It's also been reported that Arizona GOP chair Kelli  
10   Ward and Arizona State Senator Kelly Townsend also had concerns  
11   about the alternate electors plan and that, according to an email  
12   written by Mr. Chesebro, quote, Ward and Townsend are concerned  
13   it could appear treasonous, end quote.

14           Did you ever learn about any concerns that Ms. Ward or  
15   Senator Townsend had about the convening of alternate electors  
16   in Arizona?

17           A    The Fifth.

18           Q    We go to exhibit No. 18.  This is a one-page email -- or  
19   one-page exhibit rather, excuse me -- with an email from  
20   Mr. Chesebro to you, Mike Roman, as well as Josh Findlay on  
21   Saturday, December 12th, at 7:12 p.m.  Can you see the exhibit  
22   we've put up as exhibit 18?

23           A    Yes.

24           Q    Okay.  And the subject for this email is:  Tweet  
25   language for certificate.

1           And Mr. Chesebro wrote to you saying: Mike, here is my  
2 suggested language for dealing with the concern raised in the  
3 PA conference call about electors possibly facing legal  
4 exposure, parenthesis, at the hands of a partisan AG, close  
5 parenthesis, if they seem to certify that they are currently the  
6 valid electors.

7           And then he offers language with some strikeouts and  
8 bolding. Do you recognize this email?

9           A    The Fifth.

10          Q    Did you discuss the purported fix that Mr. Chesebro  
11 wrote in this email with anyone, including Mr. Chesebro?

12          A    The Fifth.

13          Q    At the end of this email, just above his signoff there,  
14 it says: It strikes me that if inserting these few words is a  
15 good idea for Pennsylvania, it might be worth suggesting to  
16 electors in other States.

17          Do you know why electors in at least some other States did  
18 not do the same and amend the language in the alternate electors  
19 certificates that were sent to Congress and the Archives?

20          A    The Fifth.

21          Q    If we go to exhibit No. 20, please, this is a few pages  
22 of emails. The top one in includes you, Ryan Terrell, Charles  
23 Nichols, Andrew Hitt, Mark Jefferson, Kenneth Chesebro, G.  
24 Michael Brown, Clayton Henson, Andrew Iverson, and Nathan  
25 Trueblood, written on November -- excuse me, December 16th, 2020,

1 at around 11:22 a.m., with the subject line: Mailing the  
2 packages for Monday's meeting.

3 Was this email exchange about mailing the alternate  
4 electors votes to the President of the Senate, the Archives, and  
5 others?

6 A The Fifth.

7 Q I'll just note for the record, the bottom of page 1 of  
8 this exhibit, it does talk about packages being mailed to the  
9 President of Senate, the U.S. Archivist, secretary of state, and  
10 district court. And that's an email from Mr. Nichols at the  
11 Wisconsin GOP.

12 In this exchange, on page 2, you asked for confirmation that  
13 the packages have been sent. And then Mr. Terrell says, quote:  
14 The timing of the delivery is sensitive for the campaign.

15 And that's at the top right there where the cursor is, in  
16 the top email on page 2. My question is, first, what was  
17 Mr. Terrell's role in the alternate elector effort?

18 A The Fifth?

19 Q Second, why is the timing of the delivery of these  
20 alternate elector votes sensitive?

21 A The Fifth.

22 Q You can take that down. Thank you.

23 Did you ever learn through direct conversation or otherwise  
24 that the former President wanted alternate electors to submit  
25 electoral college votes in States that he had lost so that the

1 Vice President, Vice President Pence, could choose them during  
2 the joint session of Congress on January 6th?

3 A The Fifth.

4 Q Beyond mailing or having these electoral college  
5 alternate votes mailed, did you help in any way to get physical  
6 copies to the Capitol, the U.S. Capitol?

7 A The Fifth.

8 Q Did you ever speak with Matt Stroia, then chief of staff  
9 to Representative Kelly, in the days before January 6th regarding  
10 the delivery of documents to the Senate Parliamentarian's  
11 Office, the U.S. Senate to be clear?

12 A The Fifth.

13 Q Were the documents you discussed with Mr. Stroia the  
14 alternate elector votes?

15 A The Fifth.

16 Q Are you aware of anybody, including yourself, actually  
17 delivering those votes to Mr. Stroia before the joint session  
18 of Congress on January the 6th?

19 A The Fifth.

20 Q If we go to exhibit No. 22, if you could zoom in on this,  
21 this is a one-page exhibit consisting of text messages sent to  
22 somebody named Michael B. My understanding, I'll represent to  
23 you, is that that's Mike Brown. Did you work with somebody named  
24 Mike Brown or G. Michael Brown?

25 A The Fifth.

1           Q   In this exchange, Mr. Brown informed the other person,  
2   Angela McCallum, that he had, quote, just landed and that he had,  
3   quote, never flown clutching his bag before, end quote. He  
4   actually says "clutching my bag before," and he explained that  
5   the reason why he flew clutching his bag was because he, quote,  
6   didn't want to let the docs out of his sight.

7           Do you know what documents Mr. Brown was flying with in the  
8   days before the joint session of Congress and that he says he  
9   was clutching here?

10          A   The Fifth.

11          Q   We go to exhibit No. 23. This is two pages of text  
12   messages that we'll scroll through between Mr. Brown, Angela  
13   McCallum, and Madison Crawley. On this first page, you can see  
14   here Mr. Brown sends a photo of himself wearing a suit and a mask  
15   with the U.S. Capitol over his shoulder, and he writes, quote:  
16   Mission accomplished about to Uber home, end quote.

17          And, regarding the photo, he said, below the picture, quote:  
18   This has got to be the cover of a book I write one day, end quote.

19          And, if we go to the next page, he continues, if you can  
20   zoom in on the middle of page, and he says, quote: I should  
21   probably buy Roman a tie or something for sending me on this one.  
22   Hasn't been done since 1876, and it was only three States that  
23   did it.

24          Question for you is, did you send Mr. Brown, Mike Brown,  
25   to Washington to deliver any documents in the days before January

1 6th?

2 A The Fifth.

3 Q And for what purpose did you send Mr. Brown to  
4 Washington, as he says here, apparently to deliver documents?

5 A The Fifth.

6 Q All right, you can take that down.

7 In the weeks leading up to January 6th, Professor John  
8 Eastman wrote several memos addressing the Vice President's  
9 authority to count or not count certain electoral votes during  
10 the joint session of Congress based in part on the existence of  
11 purportedly competing slates of electoral votes sent in by these  
12 alternate electors.

13 Did you discuss the role of the Vice President during the  
14 joint session of Congress with Professor Eastman?

15 A The Fifth.

16 Q Did you discuss the role of the Vice President during  
17 the joint session with Boris Epshteyn?

18 A The Fifth.

19 Q And did you ever discuss the role of the Vice President  
20 during the joint session with Mr. Chesebro, Mr. Giuliani, or  
21 anybody else?

22 A The Fifth.

23 Q Before January 6th, 2021, did you know that the  
24 alternate electors' votes would be cited as a means of putting  
25 pressure on Vice President during the joint session of Congress



1 to count or not count certain electoral votes?

2 A I'm sorry. Can you ask that again?

3 Q Yeah, sure. So, before January 6th, 2021, the day of  
4 the joint session, did you know that the alternate electors votes  
5 would be cited as a means of putting pressure on or encouraging  
6 Vice President Pence during the joint session of Congress?

7 A The Fifth.

8 Q Did you talk to anyone in the White House, including the  
9 President, about the President's efforts to have Vice President  
10 Pence count or not count certain votes during the joint session  
11 of Congress on January 6th?

12 A The Fifth.

13 Q Did you have any role in drafting, encouraging, sending  
14 or delivering letters from State legislators to Members of  
15 Congress, the Department of Justice or the Vice President related  
16 to election fraud or the January 6th, 2021, joint session of  
17 Congress?

18 A The Fifth.

19 Q If we bring up exhibit No. 25, please. This is a  
20 one-page exhibit. It's a tweet. It's fairly big, but it is from  
21 your account @MikeRoman with a picture of people in front of the  
22 Washington Monument. And this was posted on January 6th,  
23 according to the time stamp, at 11:06 a.m.

24 First of all, can you see the exhibit we put up as exhibit  
25 No. 25?

1           A    Yes.

2           Q    And, in this tweet, there are the hashtags  
3   FightForAmerica, FightforTrump and January6th. Do you  
4   recognize this tweet from your public Twitter account?

5           A    The Fifth.

6           Q    Were you in Washington on January 6th, 2021?

7           A    The Fifth.

8           Q    Did you take this picture of the crowd with the  
9   Washington Monument in the background on January 6th, 2021?

10          A    The Fifth.

11          Q    Did you attend the President's rally on the Ellipse in  
12   the morning of January 6th and into the first part of the  
13   afternoon?

14          A    The Fifth.

15          Q    Did you go to the Capitol at any point on January 6th,  
16   2021?

17          A    The Fifth.

18          Q    Have you talked to anybody who went to the Capitol on  
19   January 6th, 2021?

20          A    The Fifth.

21          Q    And, whether before, on, or after January 6th, so at any  
22   point, did you discuss the rally on the Ellipse with anyone who  
23   worked in the White House at the time, including President Trump?

24          A    The Fifth.

25          Q    At any time, whether before, on, or after January 6th,

1 did you discuss the President's rally on the Ellipse with Mr.  
2 Giuliani, Ms. Bobb, Ms. Ellis, Mr. Eastman, Mr. Chesebro, or  
3 anybody working with Mr. Giuliani's legal team?

4 A The Fifth.

5 Q Do you know why the President encouraged his supporters  
6 to go to the Capitol on January 6th, including in his speech?

7 A The Fifth.

8 Q I'm going to stop there and see if anybody has any  
9 followup questions to what we've gone over.

10 [REDACTED] No, nothing for me. Thank you.

11 BY [REDACTED]

12 Q So, Mr. Roman, at this point, we will see if there is  
13 anything that you would like to add for the record and give you  
14 the opportunity to add anything that you would think is helpful  
15 to the select committee's investigation.

16 A No.

17 Q And, just for the record, these are the questions that  
18 we've gone over. It's been about an hour and 45 minutes or so  
19 since we began. These are not necessarily all of the questions  
20 that we would have asked, but, based on your answers to certain  
21 of the questions, it looks like several areas of inquiry would  
22 involve you asserting the Fifth. And so, in that case we're  
23 going to refrain from other questions, but we have discussed many  
24 topics here today.

25 And I think, at this point, unless there is anything that

1     you, Mr. Warrington, would like to put on the record or any of  
2     the other attorneys who represent you, Mr. Roman, I think we'll  
3     be near conclusion.

4             Mr. Warrington. We don't have anything further other than  
5     what was contained in our correspondence with the chairman and  
6     obviously the assertions made today.

7             [REDACTED]. Okay. Thank you, Mr. Warrington.

8             Then, at this point, I think we can recess subject to the  
9     call of the chair and conclude the deposition.

10            Mr. Warrington. And we would put on the record our  
11     objection to that. Our position is that Mr. Roman has fulfilled  
12     his obligations under the subpoena.

13            [REDACTED]. Thank you. That will be noted. And then we  
14     can go off the record.

15            [Whereupon, at 11:46 a.m., the deposition was recessed,  
16     subject to the call of the chair.]

Certificate of Deponent/Interviewee

I have read the foregoing \_\_\_\_ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

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Witness Name

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Date